REMARKS/ARGUMENTS

The Examiner did not indicate in the Office Action that he reviewed the references listed in the Form 1449 submitted with the Information Disclosure Statement mailed on Dec. 13, 2001, which PAIR shows as entered on Jan. 3, 2002. Applicants have attached a copy of the Form 1449 included with the previously submitted IDS and request that the Examiner review the cited references in the previously submitted Form 1449 and initial each reference to indicate such review.

Applicants have amended claims 5, 17, and 29 to add a period to overcome the indefiniteness rejection (35 U.S.C. §112, par. 2).

The Examiner rejected claims 1-36 as anticipated (35 U.S.C. §102(b)) by Gibson (U.S. Patent No. 6,006,193). Applicants traverse.

Claims 1, 13, and 27 concern implementing a workflow comprised of nodes, and require: generating a workflow packet accessed by users at the nodes in the workflow; receiving a request to add one target object in one of a plurality of data stores to the workflow packet, wherein each data store includes multiple objects; determining a first object identifier of the target object that is used to identify the target object in one data store; generating a second object identifier indicating the data store including the target object and the first object identifier; and inserting the generated second object identifier into the workflow packet, where nodes accessing objects in the workflow packet use the second object identifier to access the target object for use at the node.

The Examiner cited col. 3, lines 43-63 of Gibson as disclosing the claim requirement of receiving a request to add one target object in one of a plurality of data stores to the workflow packet, wherein each data store includes multiple objects. (Office Action, pg. 2) Applicants traverse.

The cited col. 3 of Gibson mentions that the system prevents the storage of a definitional data item in memory intended to be associated with one of the nodes in violation of the hierarchical structure. This allows a hierarchical organization to control access to or processing of work items by placing restrictions on definitional data items for storage.

According to Gibson, a definitional data item is associated with a work item and includes information about nodes in a process for manipulating the work item, information about a characteristic of a list of work items for a node, information about rules for a protocol for

executing the node, etc. A node represents a task in a work environment and a unit step of work in one or more processes. (Gibson, col. 1, lines 20-43) Thus, a definitional data item provides information about how a work item is processed.

The claim requires receiving a request to add a target object in one of a plurality of data stores to a workflow packet. The cited col. 3 discusses a request to store a definitional data item for a node. A definitional data item as defined by Gibson does not comprise a target object that is added to a workflow packet that is accessed by users at nodes in the workflow as claimed. Instead, a definitional data item provides information about how a work item is processed at nodes. Accordingly, the cited request to store a definitional data item does not disclose the claim requirement of a request to add one target object in one of a plurality of data stores to a workflow packet.

The Examiner cited col. 1, lines 54-67 and col. 2, lines 14-33 of Gibson as disclosing the claim requirement of generating a second object identifier indicating the data store including the target object and the first object identifier, which identifies the target object in one data store. (Office Action, pg. 3) Applicants traverse.

The cited col. 1 mentions that organizations are structured into separate suborganizations, such as departments, divisions, where each suborganization requires control over access and processing of the suborg's work items. If the suborganizations use separate databases to control access and processing, the work items may be shared by making and distributing copies of the work items. In such case, one must keep track of the copies and consistency of definitional data concerning shared work items.

Although the cited col. 1 discusses how a suborganization may control and share work items to be processed, nowhere does the cited col. 1 anywhere disclose the claim requirement of generating a second object identifier indicating the data store including the target object and the first object identifier identifying the target object in the data store. Nowhere does the cited col. 1 anywhere disclose or mention generating an object identifier having the claimed components.

The cited col. 2 mentions that work items are stored in a database and that definitional data items are associated with organizational identifiers . The operators may access one of the definitional data items only if the operator is associated with the same organization identifier associated with the definitional data item. Thus, the cited col. 2 concerns how one may modify definitional data items providing information on how a work item is processed.

Nowhere does the cited col. 2 anywhere disclose the claim requirement of generating a second object identifier indicating the data store including the target object and the first object identifier identifying the target object in the data store. Instead, the cited col. 2 discusses how an operator may modify a definitional data item, providing information on how a work item is processed, if the operator is associated with the same organization associated with the definitional data item. There is no disclosure or mention in this cited col. 2 of generating a second object identifier indicating a data store including the data object to add to a workflow packet and a first object identifier identifying the target object in the data store.

The Examiner cited col. 2, lines 34-46 of Gibson as disclosing the claim requirement of inserting the generated second object identifier into the workflow packet, where nodes accessing objects in the workflow packet use the second object identifier to access the target object for use at the node. (Office Action, pg. 3) Applicants traverse.

The cited col. 2 mentions that a definitional data item is associated with an organization identifier so that the work item flows through a workflow system used by different organizations. This allows multiple organizations' definitional data items to be stored together while remaining logically separate as a result of organizational identifiers.

Although the cited col. 2 discusses how organizational identifiers may be associated with definitional data items, providing information on the processing of a work item, nowhere does the cited col. 2 anywhere disclose or mention inserting a generated object identifier as claimed into a workflow packet, where nodes use the generated second object identifier to access objects in the workflow packet for use at the node. Instead, the cited col. 2 is concerned with associating organizational identifiers with definitional data items to control which organizations may access and modify. This is different than the claim requirement of inserting generated second object identifiers into workflow packets as claimed.

Accordingly, Applicants submit that claims 1, 13, and 25 are patentable over the cited art because the cited Gibson does not disclose all the claim requirements.

Claims 2, 14, and 26 are patentable over the cited art because they depend from one of claims 1, 13, and 25, which are patentable over the cited art for the reasons discussed above. Moreover, these claims provide additional grounds of distinction over the cited art.

Claims 2, 14, and 25 depend from claims 1, 13, and 25 and further require that the data stores are capable of being different types of data stores and from different vendors. The

Examiner cited col. 1, lines 9-19 of Gibson as disclosing the additional requirements of these claims. (Office Action, pg. 3) Applicants traverse.

The cited col. 1 mentions that members of an organization are provided work items for execution from a database. Work items representing tasks may arrive at the database from outside the organization or from inside. Nowhere does the cited col. 1 anywhere disclose that different data stores are capable of being different types and from different vendors. There is no mention in the cited col. 1 of data stores from different vendors.

Accordingly, claims 2, 14, and 25 provide additional grounds of patentability over the cited art because the additional requirements of these claims are not disclosed in the cited art.

Independent claims 3, 15, and 27 concern performing an Input/Output (I/O) operation on an object during execution of a workflow comprised of nodes, and require: providing a plurality of objects stored in one of multiple data stores, wherein each object is identified within the data store with a first object identifier; providing a workflow packet referencing at least one object with a second object identifier, wherein the second object identifier indicates one of the data stores and the first object identifier of the referenced object in the data store; receiving, from one node, an I/O request for one target object referenced by one second object identifier in the workflow packet; determining from the second object identifier the data store of the target object and the first object identifier of the target object; and performing the I/O request on the target object at the determined first object identifier in the determined data store.

The Examiner referenced the rejection of claim 1 in rejecting the requirements of independent claims 3, 15, and 27. (Office Action, pgs. 3-4) Applicants traverse for the following reasons.

As with claims 1, 13, and 25, claims 3, 15, and 27 require that a workflow object have at least one second object identifier, indicating one of the data stores and the first object identifier identifying the object in the data store. As discussed above, nowhere does the cited Gibson disclose these requirements. The cited Gibson discusses associating organizational identifiers with definitional data items providing information on how a work item is processed to limit access to the definitional data items to operators that are part of organizations whose identifier is associated with the definitional data item. Nowhere does this cited Gibson anywhere disclose a workflow object referencing at least one object with a second object identifier, where the second object identifier indicates one data store and a first object identifier.

Moreover, the cited Gibson is concerned with associating an organizational identifier with a definitional data item to control which operators may access the definitional data item. This cited Gibson does not disclose providing a second object identifier in a workflow packet to use to access the target object when the workflow packet is being processed at the node. Instead, the cited Gibson is concerned with limiting access to a definitional data item, not providing a second object identifier to identify objects referenced by workflow packets.

Accordingly, independent claims 3, 15, and 27 are patentable over the cited Gibson because the cited Gibson does not disclose all the claim requirements.

Claims 4-12, 16-24, and 28-36 are patentable over the cited art because they depend from one of claims 3, 15, and 27, which are patentable over the cited art for the reasons discussed above. Moreover, the following dependent claims provide additional grounds of patentability over the cited art.

Claims 4, 16, and 28 depend from claims 3, 15, and 27 and further require that one workflow packet is associated with a plurality of the nodes in the workflow, and wherein the nodes submit I/O requests for one or more objects referenced by the second object identifiers in the workflow packet. The Examiner referenced the rejection of claim 1 as disclosing the requirements of these claims. (Office Action, pg. 4) With respect to claim 1, the Examiner found that col. 1, lines 20-43 of Gibson discloses that a workflow packet is accessed by users at the nodes in the workflow. (Office Action, pg. 2) Applicants traverse the rejection of claims 4, 16, and 28 with respect to the cited col. 1 of Gibson.

The cited col. 1, lines 20-43 discusses work items that may be manipulated by nodes. The definitional data item includes information about nodes in a process for manipulating the work item. In the cited col. 1, a node represents a step of work specified in one or more processes. Although the cited col. 1 mentions that a work item may be processed or manipulated by nodes, nowhere does the cited col. 1 anywhere disclose the claim requirement that the node submit I/O requests for one or more objects referenced by the second object identifiers in the workflow packet. Instead, the cited col. 1 discusses how the nodes may process work items representing tasks (Gibson, col. 1, lines 9-17), not objects referenced by the claimed second object identifiers in the workflow packet.

Accordingly, the additional requirements of claims 4, 16, and 28 provide additional grounds of patentability over the cited Gibson because the additional requirements of these claims are not disclosed in the cited art.

Claims 5, 17, and 29 provide additional grounds of patentability over the cited art for the reasons discussed with respect to claims 2, 14, and 26.

Claims 10, 22, and 34 depend from claims 3, 15, and 27 and further require receiving a request, from at least one node, to add one second object identifier to the workflow packet referencing one object in one of the data stores that is not already referenced in the workflow packet, wherein subsequent nodes in the workflow are capable of accessing the object referenced by the added second object identifier. The Examiner cited col. 4, lines 36-67 of Gibson as teaching the additional requirements of these claims. (Office Action, pgs. 5-6) Applicants traverse.

The cited col. 4 mentions how an operator in a sub-organization manipulates a work item. An operator of a sub-organization can access or is affected by a definitional data item only if one of the operators is associated with the same sub-organization identifier associated with the definitional data item. Nowhere does this cited col. 4 anywhere disclose receiving from a node a second object identifier to add to a workflow packet referencing one object in the data store. Instead, the cited col. 4 discusses how to control access to definitional data items, which include information about the processing of a work item.

Accordingly, claims 10, 22, and 34 provide additional grounds of patentability over the cited Gibson because the additional requirements of these claims are not disclosed in the cited Gibson.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-36 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: <u>January 4, 2005</u>

By:_____

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